



STATE OF HAWAII
DEPARTMENT OF HEALTH
P.O. BOX 3378
HONOLULU, HAWAII 96801-3378

In reply, please refer to:
EMD / CWB

12032PJLS.06c

DATE: December 12, 2006
NPDES PERMIT NO.: HI S000092

PERMIT RATIONALE: **APPLICATION FOR NATIONAL POLLUTANT
DISCHARGE ELIMINATION SYSTEM (NPDES) PERMIT
TO DISCHARGE TO THE WATERS OF THE UNITED
STATES**

PERMITTEE: **STATE OF HAWAII
DEPARTMENT OF DEFENSE (DOD)**

PROJECT: **HAWAII ARMY NATIONAL GUARD (HIARNG)
REMEDIAL ACTION, FORT RUGER**

PROJECT STREET ADDRESS

Inside Diamond Head Crater
Honolulu, Oahu, Hawaii

PERMITTEE STREET ADDRESS

Department of Defense
Hawaii Army National Guard
3949 Diamond Head Road
Honolulu, Hawaii 96816-4495
Contact: Mr. Dean Norwood
 Deputy Environmental
 Program Manager
Phone No.: (808) 672-1292
Fax No.: (808) 672-1262

GENERAL CONTRACTOR

Brice Environmental Services Corporation
3200 Shell Street (P.O. Box 73520)
Fairbanks, Alaska 99707-3520

Contact: Mr. Craig Jones
 Executive VP
Phone No.: (907) 452-2512
Fax No.: (907) 452-5018

PERMITTEE MAILING ADDRESS

Hawaii Department of Defense
Hawaii Army National Guard
c/o AMEC Earth and Environmental
3375 Koapaka Street, Suite F251
Honolulu, Hawaii 96819-1879
Attention: Mr. Eric Wetzstein

Phone No.: (808) 545-2462
Fax No.: (808) 528-5379

DULY AUTHORIZED REPRESENTATIVE

AMEC Earth and Environmental
3375 Koapaka Street, Suite F251
Honolulu, Hawaii 96819-1879

Contact: Mr. Eric Wetzstein
 Honolulu Operations Manager
Phone No.: (808) 545-2462
Fax No.: (808) 528-5379

TABLE OF CONTENTS

<u>Description</u>	<u>Page</u>
PERMIT	2
SCOPE OF THE CONSTRUCTION ACTIVITY AND LOCATION OF THE PROJECT	2
RECEIVING WATER CLASSIFICATION	3
DESCRIPTION OF THE PROPOSED DISCHARGE	3
PERMIT CONDITIONS	4
PROPOSED DETERMINATIONS	4

PERMIT STATUS

The Permittee submitted an Individual NPDES Permit application, received November 8, 2006, and additional information, dated November 29, 2006, for coverage of storm water discharges associated with construction activity to the unnamed inland wetland, Class 1, Inland Water on the Island of Oahu. The Department of Health (DOH), Clean Water Branch (CWB), reviewed the application and considers it to be complete.

The Director of Health (Director) proposes to issue a permit to discharge to the waters of the State and has included in the proposed draft permit those terms and conditions which the Director determined are necessary to carry out the provisions of the Federal Clean Water Act of 1977 (PL 95-217) and Hawaii Revised Statutes (HRS), Chapter 342D.

SCOPE OF THE CONSTRUCTION ACTIVITY AND LOCATION OF THE PROJECT

The purpose of the project is to excavate the former rifle range and former pistol range to separate the lead particulates from the soil through a soil washing process. Approximately 6.8 acres of the former rifle firing range will be excavated to a depth of 1-foot below the existing grade. Approximately 3.8 acres will be excavated to a depth of 6-inches below grade. The former pistol range berm excavation depths will range from 1 - 6 feet below grade.

The reason for the remedial action is to reduce the lead concentration levels of the former firing ranges to protect human health for land use scenarios under the current master plan; significantly reduce the potential for ecological impact; and result in an unencumbered land transfer from HIARNG to Department of Land and Natural Resources, with no notice or deed restrictions required.

Site mobilization of equipment from Alaska will begin approximately December 6, 2006. Any activities that disturb the existing conditions of the site will not be started until the effective date of the permit. Clearing and grubbing the site is proposed to be completed from January 3, 2007,

through January 6, 2007. Excavation and soil stockpiling is proposed to be completed from January 10, 2007, through February 13, 2007; soil and erosion control measures is proposed to be installed prior to any activities that would expose the ground surface. Remedial activities is proposed to be completed February 14, 2007, through April 17, 2007. Site restoration is proposed to be performed from March 7, 2007, until April 24, 2007, in preparation for a Concert in the Crater scheduled for May 19, 2007.

RECEIVING WATER CLASSIFICATION

The storm water runoff from the project site will discharge to the unnamed inland wetland which is classified as a Class 1, Inland Water. "It is the objective of class 1 waters that these waters remain in their natural state as nearly as possible with an absolute minimum of pollution from any human-caused source. To the extent possible, the wilderness character of these areas shall be protected. Waste discharge into these waters is prohibited. Any conduct which results in a demonstrable increase in levels of point or nonpoint source contamination in class 1 waters is prohibited." (HAR, Chapter 11-54, Section 11-54-3(b)(1))

DESCRIPTION OF THE PROPOSED DISCHARGE

The Site-Specific Construction Best Management Practices (BMPs) Plan shall be designed, operated, implemented, and maintained to ensure that storm water discharges associated with construction activities will not cause or contribute to a violation of applicable state water quality criteria as specified in Hawaii Administrative Rules (HAR), Chapter 11-54, Section 11-54-4.

Non-storm water handling method: If analytical results for the remedial process water are above State Regulations, the process water will be treated on-site. If treatment is not able to reduce dissolved lead concentrations to below State Regulations, the remedial process water will be disposed at a mainland EPA approved RCRA Treatment, Storage, and Disposal Facility. If they are below State Regulations, the water will be used for irrigation purposes during site restoration.

Soil and Erosion Control Measures: Silt fencing will be installed prior to disturbing any ground cover at the down-gradient limits of the excavation areas. Silt fencing will also be installed down-gradient of any soil stockpiling areas in the staging area. The site map contains the locations of the silt fencing. Silt fencing is the main measure to prevent storm water runoff from carrying sediment outside the excavation area. Impacted soil containing lead is the main potential pollutant at the site.

Construction Ingress/Egress: The site map (Figure 1-2) identifies the haul routes where excavated material will travel by and where site delivery/pick up will occur. Any construction equipment leaving the site will be dry brushed to remove any accumulated dirt in a designated area near the staging area.

PERMIT CONDITIONS

The Director has considered the permit conditions to discharge storm water runoff associated with construction activity, established pursuant to the Federal Water Pollution Control Act,

Federal Clean Water Act, and the HRS. The Director has determined that the discharge will not cause degradation to the receiving water environment when the Permittee complies with the conditions of the permit. Therefore, based on current information, the Director proposes to issue a permit.

PROPOSED DETERMINATIONS

1. The General Requirements as stated in Part A of the permit are necessary in preventing pollutants to be discharged with the storm water to the receiving State waters, in addition to the general BMPs provisions proposed in the application.
2. The Reporting Requirements as stated in Part B of the permit are to inform the Permittee of submittal and reporting requirements for compliance with the permit conditions. The Permittee shall submit the following to the CWB, unless otherwise noted:
 - a. Solid Waste Disclosure Form for Construction Sites to the Office of Solid Waste Management
 - b. County-approved Erosion and Sediment Control Plan (CWB-Individual NPDES Form C: Section 13.b.v.)
 - c. Updated Construction Schedule, as applicable (CWB-Individual NPDES Form C: Section 13.b.vi.)
 - d. Notice of Cessation Form (CWB-NOC Form)
3. The BMPs as stated in Part C of the permit are to emphasize pollution prevention measures that are applicable to the construction activities. The application cited the Special Conditions for Land Disturbances from HAR, Chapter 11-55, Appendix C, Section 11.